STATEMENT

PhRMA
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January 22, 2014

Michael Gelder, Senior Advisor on Health Policy

Cristal Thomas, Deputy Governor

Office of the Governor

James R. Thompson Center

100 W. Randolph, 16-100

Chicago, IL 60601

Via Electronic Mail

Re: Proposed Updates to Office of Patient Protection Regulation 958 CMR 3.000 – Health Insurance Consumer Protection

To Whom It May Concern:

The Pharmaceutical Research & Manufacturers Associations ("PhRMA") appreciates this opportunity to comment on the State of Illinois' proposed Section 1115 research and demonstration waiver.

PhRMA is a voluntary nonprofit organization representing the country's leading research-based pharmaceutical and biotechnology companies, which are devoted to inventing medicines that allow patients to lead longer, healthier, and more productive lives. PhRMA companies are leading the way in the search for cures. PhRMA believes that robust health insurance coverage of a wide range of therapeutic classes of prescription drugs is vital to ensure that all patients have meaningful access to the medications that they need. A transparent and

easy-to-navigate internal grievance process, affording enrollees an opportunity to challenge an adverse determination by a carrier that a particular treatment is not medically necessary or is experimental or investigational, is a critical safeguard to ensure access to high-quality, medically necessary care. That is especially so for enrollees with serious and complex health conditions requiring one or more highly-targeted therapies, which may be more likely to be viewed by the carrier as experimental or not "medically necessary". The medical needs of the most vulnerable enrollees can be assessed only on a case-by-case basis, and a transparent utilization review process and comprehensive internal grievance procedures are indispensable to ensure that carriers make individualized coverage determinations and do not inappropriately deny enrollees access to the care that they need.

As the State seeks to implement its *Path to Transformation* waiver, PhRMA urges the State to ensure that its program retains beneficiary access to medically necessary care. In particular, PhRMA urges the State to implement its proposed expansion of its medication therapy management (MTM) program under the Delivery System Reform Incentive Payments (DSRIP) projects in a manner that supports adherence and provides comprehensive medication management. An effective MTM program can support patient adherence, decrease costs and improve outcomes for patients with chronic diseases, and help patients and their physicians achieve clinical goals. A comprehensive medication management program should reflect a standard of care that ensures each patient's medications are individually assessed to ensure that the medication is: 1) appropriate, 2) effective for the medical condition, 3) safe given the comorbidities and other medications being taken, and 4) willing and able to be taken by the patient as intended. Specifically, we encourage the State to include the following components in any expansion of its medication therapy management program:

- **Development of a care plan** that incorporates individualized therapy goals and personalized interventions in conjunction with the patient and the patient's health care provider(s). Such a care plan should recommend interventions to address the patient's medication related problems that are interfering with the intended goals of therapy. The patient's healthcare provider should have ultimate decision making authority for any changes made to the patient's medication or treatment regimen.

- **Follow-up evaluation of the patient** as a means to determine the actual outcomes resulting from the recommended interventions and improvement in clinical and patient goals of therapy.

- **Documentation of and timely communication to the patient's health care provider(s)** the services provided, drug therapy problems identified, and therapeutic recommendations.

A comprehensive medication management program that assists individuals and their providers in adhering to recommended treatments and achieving clinical goals can achieve the State's goals of improving healthcare utilization and reducing costs, as well as improving patients' quality of life. We urge the State of Illinois to adopt these principles as part of any medication management program.

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We thank you for your consideration of these comments on the *Path to Transformation* waiver proposal. We urge the State to implement its changes to the Medicaid and CHIP programs in a manner that facilitates improved quality of care and access to care. We look forward to working with the State as the waiver proposals are implemented. Please feel free to contact me if you have any questions regarding these comments.

Respectfully submitted,

Kristin Parde

Deputy Vice President, State Policy